



October 18, 2018

Subject: ET Docket 18-284, Metrom Rail Request for Waiver.

Federal Communications Commission
445 12th Street SW, Washington, DC 20554

Dear Office of Engineering and Technology Manager,

We are writing to provide a public comment on the Metrom Rail LLC (Metrom) request for a waiver of certain Part 15 rules for ultra wideband (UWB) radio. This request is in the public interest by promoting safer train and transit operations.

iTrack has been successfully using UWB technology since 2004 for a variety of applications, including autonomous commercial lawn care, mobile stage props for theater productions, and automated guided vehicles for manufacturing environments. The UWB technology has been key to successful deployment of our tracking and navigation technology in environments where alternate tracking technologies are unavailable.

Metrom's request is reasonable and limited:

- This waiver request affects only units deployed (and controlled) by the rail operators
- Operation is limited only to known areas (rail tracks and equipment along rail tracks)
- The fixed outdoor infrastructure proposed uses the strictest of the UWB spectrum masks
- The additional gain for the Metrom directional antennas will be directed exclusivity on the rail tracks
- Surveillance systems are already allowed to operate outdoors by Part 90 users but with less strict emissions masks
- The argument that fixed units are equivalent to handheld units is logical and effectively has already been made by other companies in their use of UWB today.

We support the FCC's issuance and allowance of the Special Temporary Authority (STA) and Waiver process. Waivers allow for public and private stakeholders to gather real world data and proof points about technology while being on a limited scale. This data is extremely helpful in evaluating the value and safety of UWB technology.

Overall, we are in support of this waiver request and see both the public value and the efforts made to address potential concerns.

Sincerely,

G. E. Smid, Ph.D.

President, iTrack

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